

PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application No.: 10/711,705 Confirmation No.: 5704
Applicants: Henry W. Grant Jr.
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Examiner: Norman, Samica L.
Title: METHOD AND SYSTEM TO EVALUATE ANTI-MONEY
LAUNDERING RISK

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APPELLANT'S BRIEF

I. Real Party in Interest

Bank of America Corporation is the real party in interest.

II. Related Appeals and Interferences

There are no other appeals or interferences, known to the Applicant, or Applicant's legal representatives, which will directly affect or be directly affected by or have a bearing on the Board's decision in this pending appeal.

III. Status of Claims

The present application includes Claims 1, 4-14, 16-17, 19-20, 23-27, and 30-42, which are pending. Claims 2-3, 15, 18, 21-22 and 28-29 are cancelled. Claims 1, 4-10, 27 and 30-36 are withdrawn.

Claims 11-14, 16-17, 19-20, 23-26 and 37-42 are currently being examined and stand rejected by the March 16, 2010 final rejection. The March 16, 2010 final rejection of Claims 11-14, 16-17, 19-20, 23-26 and 37-42 is being appealed herein.

IV. Status of Amendments

There were no amendments filed after the final Office Action of March 16, 2010. Applicants chose to proceed directly with this appeal. All papers filed prior to the March 16, 2010 final Office Action by Applicant have been entered.

V. Summary of Claimed Subject Matter

As described in the present application, embodiments of the present invention relate to financial systems, products or the like and more particularly to a method and system to evaluate illegal use of financial systems, products or the like, such as money laundering or similar schemes.

With the use of financial systems, products and the like by terrorists and other criminals to finance and support their activities, governments have promulgated guidelines and regulations to detect and monitor use of such systems and products. Compliance with these governmental guidelines and regulations can impose significant burdens on financial institutions. Monitoring every transaction for the possibility of use with respect to illicit or illegal activity can be an insurmountable task. Additionally, an audit trail may be needed to show compliance with governmental laws and regulations or institutional directives and policies. There may also be a need to document why certain actions were taken or not taken or justification for a certain level of scrutiny placed on various customers. There may also be issues with respect to only profiling particular customers so additional basis or criteria for monitoring certain customers or taking particular actions may be needed. Embodiments of the present invention address these issues according to various aspects.

In accordance with an embodiment of the present invention, a method to evaluate anti-money laundering risk includes identifying a person or other legal entity to be evaluated and selecting a country associated with the person or other legal entity. At least one financial product or financial instrument associated with the person or other legal entity is selected as well as a

customer type associated with the person or other legal entity. A risk rating is determined based on responses to predetermined criteria or questions related to the selected country, the at least one selected financial product and the selected customer type.

Claims 11 and 17 are independent claims that stand rejected under the same art.

Claim 11 is a method to evaluate anti-money laundering risk. Turning to the body of Claim 11, the first element of Claim 11 is directed to “identifying a person or other legal entity to be evaluated.” This element is discussed in the originally-filed specification at paragraph [0031] as well as illustrated by element 102 of Figure 1. The second element of Claim 11 is directed to “selecting a country associated with the person or other legal entity.” This element is discussed in the originally-filed specification at paragraph [0031] as well as illustrated by element 104 of Figure 1. The third element of Claim 11 is directed to “selecting at least one financial product or investment associated with the person or other legal entity.” This element is discussed in the originally-filed specification at paragraph [0031] as well as illustrated by element 106 of Figure 1. The fourth element of Claim 11 is directed to “selecting a customer type associated with the person or other legal entity.” This element is discussed in the originally-filed specification at paragraph [0031] as well as illustrated by element 108 of Figure 1. The fifth element of Claim 11 is directed to “determining a risk rating for evaluating anti-money laundering risk, using a computer, based on responses to predetermined criteria or questions related to the country, the at least one financial product or investment and the customer type.” This element is at least shown at element 110 of Figure 1 and is discussed in the originally-filed specification at paragraph [0032]. The sixth element of Claim 11 is directed to “evaluating a sophistication of the person or other legal entity with respect to the at least one selected financial product or investment.” This element is at least shown at element 110 of Figure 1 and is discussed in the originally-filed specification at paragraphs [0032] and [0094]. The seventh element of Claim 11 is directed to “determining the at least one selected financial product or investment’s propensity for use for money laundering.” This element is at least shown at element 110 of Figure 1 and is discussed in the originally-filed specification at paragraphs [0032] and [0097]. The eighth element of Claim 11 is directed to “presenting the risk rating to a user.” This element is at least shown at element 114 of Figure 1 and is discussed in the originally-filed specification at paragraphs [0033].

Claim 17 is a system to evaluate anti-money laundering risk. Turning to the body of Claim 17, the first element of Claim 17 are directed to “a server.” This element is discussed in the originally-filed specification at paragraph [0110] as well as illustrated by element 1802 of Figure 1. The second element of Claim 17 is directed to “a risk rating tool operable on the server.” This element is discussed in the originally-filed specification at paragraphs [0110]-[0115] as well as illustrated by element 1804 of Figure 18. The third element of Claim 17 is directed to “wherein the risk rating tool is adapted to determine a risk rating of a person or other legal entity to be evaluated based on responses to predetermined criteria related to a selected country associated with the person or other legal entity, at least one selected financial product associated with the person or other legal entity, and a selected customer type associated with the person or other legal entity.” This element is at least shown at elements 102-110 of Figure 1 and is discussed in the originally-filed specification at paragraph [0032]. The fourth element of Claim 17 is directed to “wherein the risk rating tool is programmed to determine a risk rating based on responses to the predetermined criteria related to at least one selected financial product or investment.” This element is at least shown at elements 102-110 of Figure 1 and is discussed in the originally-filed specification at paragraph [0032]. The fifth element of Claim 17 is directed to “the predetermined criteria comprising . . . a customer sophistication with respect to the selected financial product or investment.” This element is at least shown at element 110 of Figure 1 and is discussed in the originally-filed specification at paragraphs [0032] and [0094]. The sixth element of Claim 17 is directed to “the predetermined criteria comprising . . . a propensity of the selected financial product or investment for use for money laundering.” This element is at least shown at element 110 of Figure 1 and is discussed in the originally-filed specification at paragraphs [0032] and [0097].

VI. Grounds of Rejection to be Reviewed on Appeal

1. Whether Claims 11-14, 16-17, 19-20, 23-26 and 37-42 were properly rejected under 35 U.S.C. § 102(b) as anticipated by U.S. Patent Application Publication 2002/0138407 by Lawrence et al. (hereinafter “Lawrence”).

VII. Arguments

A. Claims 11-14, 16-17, 19-20, 23-26 and 37-42 Are Patentable Over Lawrence

Claims 11-14, 16-17, 19-20, 23-26 and 37-42 were rejected under 35 U.S.C. § 102(b) as being anticipated by Lawrence. For a proper rejection under Section 102, the Office must demonstrate that the identical invention is “shown in as complete detail as contained in the....claim,” and that the elements are “arranged as required by the claim....” M.P.E.P. § 2131. Applicant respectfully submits that the Office has failed to meet this burden.

Lawrence is directed to managing risk associated with a financial transaction with global risk exposure - called a global risk management system (GRM). Lawrence is directed to managing risk where a risk may have global impact and implications. Lawrence does not teach a risk determination system specifically directed towards *anti-money laundering*, even though Lawrence mentions the term “money laundering” once in the specification. The mere mentioning once of the term “money laundering” does not teach the specific limitations of Applicant’s claims. Applicant’s detailed reasoning is presented below with a heading directed to the claims discussed.

1. Independent Claim 11

Claim 11 recites, in part:

“A method to evaluate anti-money laundering risk, comprising:

...

determining a risk rating for evaluating anti-money laundering risk, using a computer, based on responses to predetermined criteria or questions related to the country, the at least one financial product or investment and the customer type, wherein the determining the risk rating comprises:

evaluating a sophistication of the person or other legal entity with respect to the at least one selected financial product or investment; and

determining the at least one selected financial product or investment’s propensity for use for money laundering; and

presenting the risk rating to a user.”

Applicant respectfully submits that there is no teaching or disclosure in Lawrence of “evaluating the person or other legal entity’s sophistication with respect to the at least one selected financial product or investment.” Lawrence only discloses “the GRM system 106 can facilitate detection and reporting of potential violations of law as well as address . . . the assessment of sophistication of a customer.” Even though Lawrence merely mentions the phrase “assessment of sophistication,” this sophistication assessment is a *general* sophistication assessment of a person, but certainly is not a sophistication evaluation “with respect to the at least one selected financial

product or investment,” as specifically claimed. Such disregard of this specific limitation of Claim 1 is clear error. As such, Applicant respectfully submits that the Office has *not* demonstrated that the *identical* invention is “shown in as complete detail as contained in the....claim,” and that the elements are “arranged as required by the claim...,” as required by M.P.E.P. § 2131.

Additionally, Applicant respectfully submits that there is no teaching or suggestion in Lawrence of “determining the at least one selected financial product or investment’s propensity for evaluating anti-money laundering risk,” as recited in Claim 11. Lawrence only states “information received can be associated with criteria including . . . the propensity of *people* in similar positions to execute unlawful or unethical transactions.” However, Lawrence does not disclose the specific claimed element of the “determining . . . the selected financial *product or investment’s* propensity . . .” Further, Lawrence is only directed to “unlawful or unethical transactions” and not the specifically disclosed “determining the at least one selected financial product or investment’s propensity” “*for evaluating anti-money laundering*” claim element.

Furthermore, there is no disclosure in Lawrence of “determining a risk rating for evaluating anti-money laundering risk, using a computer, based on responses to predetermined criteria or questions related to the country, the at least one financial product or investment and the customer type,” as recited in Claim 11. There is no discussion in Lawrence of determining a risk rating for a weighting or a risk. There is no discussion in Lawrence of determining a risk rating based on predetermined criteria or questions related to a combination of the customer’s country, the financial product/investment associated with the customer, **and** the customer type. For example, there is no discussion of determining a risk rating based on the financial product or investment associated with the customer. This is because Lawrence is only directed to global risk management system (GRM) and not a specifically-tailored anti-money laundering system as recited in the present claims.

Accordingly, it is submitted that the rejection of Claim 11 is clear error under M.P.E.P. 2131. Claim 11 is respectfully submitted to be patentable over Lawrence and reconsideration and withdrawal of the section 102 rejection of Claim 11 is respectfully requested.

2. Dependent Claims 12-14

Regarding the rejection of Claims 12-14 and 16 under 35 U.S.C. § 102 as being anticipated by Lawrence, these claims recite additional features which further patentably distinguish over Lawrence. For example, Claim 16 recites, in part:

“wherein determining the risk comprises:

determining if the person or other legal entity is currently being monitored with respect to financial activity;
determining a level of risk of the person or other legal entity being associated with terrorist activity;
evaluating a level of knowledge about the person or other legal entity; and
determining if the person or other legal entity is known to be a high risk.”

Lawrence does not teach or suggest that each of the following are performed when determining the risk rating: (1) determining if the person or other legal entity is currently being monitored with respect to financial activity; (2) determining a level of risk of the person or other legal entity being associated with terrorist activity; (3) evaluating a level of knowledge about the person or other legal entity; and (4) determining if the person or other legal entity is known to be a high risk. For example, there is no discussion at all in Lawrence about entities being associated with terrorist activity. In fact, there is no mention of the word “terrorist” in Lawrence at all. By way of another example, there is no discussion in Lawrence of “a level of knowledge about the person or other legal entity.” Applicants are at a complete loss as to how Claim 16 is not allowable over Lawrence. Additionally, Applicants note that the Examiner has not pointed out what portion in Lawrence discloses each and every element of Claim 16. It appears the Examiner has only considered the last element of Claim 16, which is clear error. Accordingly, Claim 16 is respectfully submitted to be patentable over Lawrence and reconsideration and withdrawal of the section 102 rejection of Claim 16 is respectfully requested.

Additionally, Claims 12-14, and 16 depend either directly or indirectly from independent Claim 11. Because of this dependency, Claims 12-14, and 16 include all of the features of independent Claim 11. Therefore, Claims 12-14, and 16 are also submitted to be patentably distinguishable over Lawrence, and reconsideration and withdrawal of the Section 102 rejection of these claims is respectfully requested.

3. Independent Claim 17

Turning to independent Claim 17, Applicant respectfully submits that there is no teaching or suggestion in Lawrence of the features of the embodiment of the invention recited in Claim 17. Claim 17 recites limitations similar to Claim 11 and is allowable for at least this reason alone. Accordingly, claim 17 is respectfully submitted to be patentable over Lawrence and reconsideration and withdrawal of the section 102 rejection of claim 17 is respectfully requested

Regarding the rejection of Claims 19-20, and 23-26 under 35 U.S.C. § 102 as being anticipated by Lawrence, these claims recite additional features which further patentably distinguish over Lawrence. Additionally, Claims 19-20, and 23-26 depend either directly or indirectly from independent Claim 17. Because of this dependency, Claims 19-20, and 23-26 include all of the features of independent Claim 17. Therefore, Claims 19-20, and 23-26 are also submitted to be patentably distinguishable over Lawrence, and reconsideration and withdrawal of the Section 102 rejection of these claims is respectfully requested.

4. Dependent Claims 37-42

Claims 37-42 are dependent from either independent Claims 11 or 17, either directly or indirectly, and are thus allowable for the same reasons as Claims 11 and 17 are allowable. Additionally, Claims 37-42 recite additional features not taught by the cited art. For example, with regard to Claim 37, Applicant respectfully submits that there is no teaching or suggestion in Lawrence of 1) “determining the at least one selected financial product or investment’s attractiveness for use by terrorist,” 2) “evaluating the level of complexity of the at least one selected financial product or investment;” 3) “determining if the at least one selected financial product or investment is currently monitored for use with respect to illegal activity;” 4) “determining a level of the person or other legal entity’s knowledge of the at least one financial product or investment; and 5) “determining a level of ease of obtaining and using the at least one financial product or investment,” as recited in Claim 37. The Examiner cited paragraph [0045] and [0054] of Lawrence against Claim 37. However, Applicant is unsure as to which of the several recitations of Claim 37 the Examiner is applying these paragraphs. Nonetheless, Applicants can find no disclosure anywhere in paragraph [0045] and [0054] of Lawrence does Lawrence teach any of the cited elements of Claim 37.

For Claim 38, nowhere does Lawrence disclose any of the limitations of Claim 38. For example, there is no discussion at all in Lawrence about terrorist or attractiveness of a financial product for use in terrorism. Also, nowhere does Lawrence discuss any “level of complexity” of a financial product and in fact Lawrence does not even disclose what is inputted at all. Applicants are at a complete loss as to how Lawrence discloses each and every claim of Applicant’s claims without even mentioning what is entered into the GRM. The Office cited paragraph [0032] lines 1-4 and paragraph [0057] lines 1-11 in rejecting Claim 38, but after careful review of these sections does not reveal that Lawrence teaches the very specific recitations of Claim 38. Simply performing a keyword

search and finding keywords that are similar to words in the claims is not enough to reject the claims under section 102. For a proper rejection under Section 102, the Office must demonstrate that the identical invention is “shown in as complete detail as contained in the....claim,” and that the elements are “arranged as required by the claim....” M.P.E.P. § 2131. The Office has failed to meet this burden.

* * * * *

Conclusion

Applicant believes to have responded to all of the concerns raised by the Examiner. Therefore, Applicant respectfully submits that Claims 11-14, 16-17, 19-20, 23-26 and 37-42 are in condition for allowance. Accordingly, reversal of the rejection of Claims 11-14, 16-17, 19-20, 23-26 and 37-42 is respectfully requested.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 13-4365.

Respectfully submitted,

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VIII. Claims Appendix

The following is a clean copy of the claims involved in this appeal.

1. (Withdrawn) A method to evaluate anti-money laundering risk, comprising:
 - presenting a graphical user interface for a user to select or enter a response or answer to each of a multiplicity of criteria or questions associated with a group including a selected country, a selected financial product or investment, and a selected customer type, wherein the multiplicity of criteria or questions presented in the graphical user interface comprises:
 - allowing selecting or entering if the selected country is a cooperative jurisdiction;
 - allowing selecting or entering an International Narcotics Strategy Report Rating associated with the selected country;
 - allowing selecting or entering if the selected country is a member of the Financial Task Force on Money Laundering (FATF);
 - allowing selecting or entering if the selected country was a party to a 1988 United Nations Convention;
 - allowing selecting or entering a quality of local laws and regulations associated with the selected country;
 - allowing selecting or entering a level of government support in the selected country related to enforcement of laws and regulations and prosecution of offenders;
 - allowing selecting or entering a strength of banking industry associated with the selected country; and
 - allowing selecting or entering a quality of banking regulation and oversight associated with the selected country;
 - calculating a risk rating based on a set of values, each value being assigned to one of a plurality of different enterable or selectable responses or answers for each of the multiplicity of

criteria or questions associated with the group including the selected country, the selected financial product or investment, and the selected customer type;
presenting the risk rating to a user; and
performing a predetermined function related to anti-money laundering in response to the risk rating..

2. (Cancelled)

3. (Cancelled)

4. (Withdrawn) The method of claim 1, further comprising:
allowing selecting or entering if the selected customer type is currently being monitored;
allowing selecting or entering a level of knowledge about the selected customer type; and
allowing selecting or entering if the selected customer type is a risk for certain activities.

5. (Withdrawn) The method of claim 1, further comprising:
allowing input of a level of customer knowledge or sophistication needed to deal in the selected financial product or investment;
allowing input of a level of sophistication or complexity of the selected financial product or investment;
determining the selected product or investment's propensity for use in money laundering activity;
determining an ease of access to the selected financial product or investment; and
determining the selected financial product or investment's attractiveness for use by terrorist.

6. (Withdrawn) The method of claim 1, wherein calculating the risk rating comprises one of calculating an average of the set of values or a weighted average of the set of values.

7. (Withdrawn) The method of claim 1, further comprising calculating at least one of a country risk rating, a customer type risk rating, a product risk rating and a relationship risk rating.

8. (Withdrawn) The method of claim 1, further comprising presenting a graphical user interface for a user to enter at least one of an identification for a legal entity to be evaluated, a country associated with the legal entity to be evaluated, at least one financial product or investment associated with the legal entity to be evaluated, and at least one customer type associated with the legal entity to be evaluated.

9. (Withdrawn) The method of claim 1, further comprising presenting a graphical user interface to edit the plurality of different possible or selectable responses or answers for each of the multiplicity of criteria or questions and values assigned to each of the plurality of responses or answers.

10. (Withdrawn) The method of claim 1, wherein presenting a graphical user interface for a user comprises presenting a graphical user interface for a user to further select if the selected country is on an Office of Foreign Asset Control (OFAC) list.

11. (Previously presented) A method to evaluate anti-money laundering risk, comprising:

- identifying a person or other legal entity to be evaluated;
- selecting a country associated with the person or other legal entity;
- selecting at least one financial product or investment associated with the person or other legal entity;
- selecting a customer type associated with the person or other legal entity;
- determining a risk rating for evaluating anti-money laundering risk, using a computer, based on responses to predetermined criteria or questions related to the country, the at least one financial product or investment and the customer type, wherein the determining the risk rating comprises:
 - evaluating a sophistication of the person or other legal entity with respect to the at least one selected financial product or investment; and

determining the at least one selected financial product or investment's propensity for use for money laundering;
and
presenting the risk rating to a user.

12. (Original) The method of claim 11, wherein determining the risk comprises setting a value corresponding to each of the responses to the predetermined criteria or question.

13. (Original) The method of claim 12, wherein determining the risk comprises calculating one of an average or a weighted average of the values based on the selected country, the at least one selected financial product or investment and the selected customer type.

14. (Previously presented) The method of claim 11, wherein determining the risk further comprises at least one of:

evaluating if the selected country is a cooperative jurisdiction;

determining if the selected country was a party to the 1988 United Nations Convention on drugs;

evaluating a quality of banking regulation and oversight in the selected country;

determining if the selected country is associated with terrorist related activity or on the Office of Foreign Asset Control (OFAC) list;

evaluating a quality of local laws of the selected country; entering an International Narcotics Strategy Report Rating for the selected country;

evaluating a level of government support in the selected country for enforcement of laws and regulations and prosecution of offenses;

determining if the selected country is a member of Financial Action Task Force on Money Laundering (FATF); and

determining strength of a banking industry in the selected country.

15. (Cancelled)

16. (Previously Presented) The method of claim 11, wherein determining the risk comprises:
determining if the person or other legal entity is currently being monitored with respect to financial activity;
determining a level of risk of the person or other legal entity being associated with terrorist activity;
evaluating a level of knowledge about the person or other legal entity; and
determining if the person or other legal entity is known to be a high risk.
17. (Previously presented) A system to evaluate anti-money laundering risk, comprising:
a server; and
a risk rating tool operable on the server,
wherein the risk rating tool is adapted to determine a risk rating of a person or other legal entity to be evaluated based on responses to predetermined criteria related to a selected country associated with the person or other legal entity, at least one selected financial product associated with the person or other legal entity, and a selected customer type associated with the person or other legal entity; and
wherein the risk rating tool is programmed to determine a risk rating based on responses to the predetermined criteria related to at least one selected financial product or investment, the predetermined criteria comprising:
a customer sophistication with respect to the selected financial product or investment; and
a propensity of the selected financial product or investment for use for money laundering.
18. (Cancelled)
19. (Original) The system of claim 18, further comprising a value being set corresponding to each of the responses to the predetermined criteria.

20. (Original) The system of claim 19, wherein the risk rating tool is programmed to calculate one of an average or a weighted average of the values based on the selected country, the at least one selected financial product and the selected customer type.

21. (Cancelled)

22. (Cancelled)

23. (Previously presented) The system of claim 17, wherein the risk rating tool is further programmed to determine a risk rating based on responses to predetermined criteria related to a selected customer type, the predetermined criteria comprising:

- a customer currently being monitored with respect to financial activity;
- a level of risk of the customer being involved in terrorist activity;
- a level of a financial institutions knowledge of its customer; and
- the customer being known to be a high risk.

24. (Previously presented) The system of claim 17, wherein the risk rating tool is further programmed to calculate a risk rating based on a set of values, each value being assigned to one of a plurality of different possible or selectable responses or answers for each of a multiplicity of criteria or questions associated with a group including at least one of a selected country, a selected financial product or investment and a selected customer type.

25. (Original) The system of claim 24, further comprising a database including reports used to determine each of the set of values.

26. (Previously presented) The system of claim 17, wherein the risk rating tool is programmed to present a graphical user interface for a user to select at least one of:

- if the selected country is a cooperative jurisdiction;
- if the selected country is on an Office of Foreign Asset Control (OFAC) list;
- an International Narcotics Strategy Report Rating associated with the selected country;

if the selected country is a member of the Financial Task Force on Money Laundering (FATF);

if the selected country was a party to a 1988 United Nations Convention;

a quality of local laws and regulations associated with the selected country;

a level of government support related to enforcement of laws and regulations and prosecution of offenses;

a strength of a banking industry associated with the selected country; and

a quality of banking regulation and oversight associated with the selected country.

27. (Withdrawn) A method for making a system to evaluate anti-money laundering risk, comprising:

providing a server; and

providing a risk rating tool operable on the server, wherein the risk rating tool determines a risk rating based on responses to predetermined criteria related to a selected country, at least one of a selected financial product and a selected customer type, the risk rating tool provides a risk rating output to a user; and

adapting the risk rating tool to determine the risk based on responses to predetermined criteria, the predetermined criteria comprising:

a level of cooperativeness of the selected country with respect to anti-money laundering;

the selected country being a party to the 1988 United Nations Convention;

a quality of banking regulations and oversight in the selected country;

the selected country being associated with terrorist related activity;

the selected country being on an Office of Foreign Asset Control (OFAC) list;

a quality of local laws of the selected country;

an International Narcotics Strategy Report Rating for the selected country;

a level of government support in the selected country for enforcement of laws and regulations and prosecution of offenses;

the selected country being a member of the Financial Action Task Force on Money Laundering (FATF); and

a strength of the banking system in the selected country.

28. (Cancelled)

29. (Cancelled)

30. (Withdrawn) A computer-readable medium having computer-executable instructions for performing a method, comprising:

presenting a graphical user interface for a user to select or enter a response or answer to each of a multiplicity of criteria or questions associated with a group including a selected country, a selected financial product or investment, and a selected customer type, wherein the multiplicity of criteria or questions presented in the graphical user interface comprises:

allowing selecting or entering if the selected country is a cooperative jurisdiction;

allowing selecting or entering an International Narcotics Strategy Report Rating associated with the selected country;

allowing selecting or entering if the selected country was a party to a 1988 United Nations Convention;

allowing selecting or entering a quality of local laws and regulations associated with the selected country;

allowing selecting or entering a level of government support related to enforcement of laws and regulations and prosecution of offenses; and

allowing selecting or entering a strength of a banking industry associated with the selected country; and

allowing selecting or entering a quality of banking regulation and oversight associated with the selected country;

calculating a risk rating based on a set of values, each value being assigned to one of a plurality of different possible enterable or selectable responses or answers for each of the multiplicity of criteria or questions associated with the group including at least one of the selected country, the selected financial product or investment and the selected customer type; and presenting the risk rating to a user.

31. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, wherein calculating a risk rating comprises one of calculating an average of the set of values or a weighted average of the set of values.

32. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, further comprising calculating at least one of a country risk rating, a customer type risk rating, a product risk rating and a relationship risk rating.

33. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, further comprising presenting a graphical user interface for a user to enter at least one of an identification for a legal entity to be evaluated, a country associated with the legal entity to be evaluated, at least one financial product or investment associated with the legal entity to be evaluated, and a customer type associated with the legal entity to be evaluated.

34. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, further comprising presenting a graphical user interface to edit the plurality of different possible or selectable responses or answers for each of the multiplicity of criteria or questions and values assigned to each of the plurality of responses or answers.

35. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, wherein determining the risk comprises calculating one of an average or a weighted average of the values based on the selected country, the at least one selected financial product and the selected customer type.

36. (Withdrawn) The computer-readable medium having computer executable instructions for performing the method of claim 30, wherein presenting a graphical user interface for a user comprises presenting a graphical user interface for a user to further select at least one of:

if the selected country is on an Office of Foreign Asset Control (OFAC) list; and

if the selected country is a member of the Financial Task Force on Money Laundering (FATF).

37. (Previously presented) The method of claim 11, wherein the determining the risk rating comprises at least one of:

- determining the at least one selected financial product or investment's attractiveness for use by terrorist;
- evaluating the level of complexity of the at least one selected financial product or investment;
- determining if the at least one selected financial product or investment is currently monitored for use with respect to illegal activity;
- determining a level of the person or other legal entity's knowledge of the at least one financial product or investment; and
- determining a level of ease of obtaining and using the at least one financial product or investment.

38. (Previously presented) The method of claim 11, further comprising presenting a graphical user interface using a computer processor for a user to enter a response to each of a multiplicity of criteria or questions associated with a group including the selected country, the selected financial product or investment, and the selected customer type.

39. (Previously presented) The method of claim 38, wherein the multiplicity of criteria or questions comprises:

- identifying the person or other legal entity to be evaluated;
- selecting the country associated with the person or other legal entity;
- selecting the at least one financial product or investment associated with the person or other legal entity; and
- selecting the customer type associated with the person or other legal entity.

40. (Previously presented) The method of claim 11, wherein the determining a risk rating comprises calculating a risk rating based on a set of values, each value being assigned to one of a plurality of different possible or selectable responses or answers for each of a multiplicity of criteria or questions associated with a group including at least one of a selected country, a selected financial product or investment, and a selected customer type

41. (Previously presented) The method of claim 11, further comprising defining the multiplicity of criteria or questions comprising at least one of:

- determining whether the selected country is cooperative;
- determining if the selected country is on an Office of Foreign Asset Control (OFAC) list;
- determining an International Narcotics Strategy Report Rating;
- determining if the selected country is a member of the Financial Task Force on Money Laundering (FATF);
- determining if the selected country was a party to a 1988 United Nations Convention on drugs;
- determining a quality of local laws and regulations;
- determining a level of government support related to law enforcement and prosecution of offenders;
- determining a strength of the selected country's banking industry; and
- determining a quality of banking regulation and oversight.

42. (Previously presented) The system of claim 17, wherein the predetermined criteria is selected or entered into a graphical user interface and comprises:

- a customer sophistication with respect to the selected financial product or investment;
- a propensity of the selected financial product or investment for use for money laundering;
- an attractiveness of the selected financial product or investment for use by terrorist;
- a level of complexity of the financial product or investment;
- a current monitoring of the financial product or investment for use with respect to illegal activity;
- a level of a customer's or public's knowledge of the financial product or investment; and

a level of ease of obtaining and using the financial product or investment.

IX. Evidence Appendix

None

X. Related Proceedings Appendix

None